

Exhibit “A”

LAW OFFICE OF JOHN NEUMANN HICKEY

BY: JOHN NEUMANN HICKEY, ESQUIRE

BY: SHANE P. HICKEY, ESQUIRE

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20 WEST FRONT STREET

MEDIA, PA 19063

610-891-8883



Attorneys for Plaintiff

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY, PENNSYLVANIA
CIVIL ACTION

ANGELA HOLMAN :
1002 WEST 2ND STREET :
CHESTER, PA 19013 : No.
PLAINTIFF :

V. :
DOLLAR TREE, INC d/b/a : JURY TRIAL DEMANDED
DOLLAR TREE STORES a/k/a :
DOLLAR TREE :
1235 MACDADE BLVD. :
WOODLYN, PA 19091 :
DEFENDANT :

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
Lawyer Referral
and Information Service
One Reading Center
Philadelphia Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

AVISO

La han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defenses o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas puede continuar la demanda en contra suya previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perer dinero o sus propiedades u otros derechos importantes para usted.

Lieva esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion de Licenciados
de Filadelfia
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COMPLAINT

1. The Plaintiff is Angelia Holman, she is an adult individual who resides at 1002 West 2nd Street, Chester PA 19013.

2. The Defendant is Dollar Tree, Inc. d/b/a Dollar Tree Stores aka Dollar Tree (hereinafter referred to as “Dollar Tree”). Dollar Tree is a corporation doing business in Pennsylvania, with corporate offices located at 500 Volvo Parkway, Chesapeake, VA 23320.

3. At all times relevant hereto, Defendant Dollar Tree, purposely conducted regular and systematic business in Philadelphia County. Including selling products in Philadelphia County and renting or owning store locations in Philadelphia County. Venue is appropriate in Philadelphia County.

4. At all relevant times hereto, Dollar Tree operated, owned, and/or controlled a Dollar Tree store located at 1245 MacDade Blvd, Woodlyn, PA 19091.

5. On or about May 9, 2023, the Plaintiff was a customer and business invitee at Dollar Tree located at 1245 MacDade Blvd, Woodlyn, PA 19091.

6. At all times relevant hereto, Defendant, Dollar Tree, was acting by and through its agents, servants and/or employees who acted within the course and scope of their agency, authority and employment with this defendant.

7. At all relevant times hereto, the Defendant opened the premise involved herein to the public.

8. At all relevant times hereto, the Defendant had a duty to maintain the premises involved herein.

9. While at Dollar Tree on or about May 9, 2023, Plaintiff, while shopping, slipped and fell on a substance. After falling, Plaintiff noticed a liquid substance on the floor.

10. Plaintiff was injured as a result of the slip and fall.

11. The substance on the ground was a dangerous, negligent and/or defective condition which existed on the defendant's premise.

12. There were no signs or warnings regarding the liquid substance on the floor.

13. Defendants knew or should have known of the dangerous, negligent and/or defective condition.

14. The negligence of the defendant, Dollar Tree, by and through its employees, consisted of:

- a. Having a substance accumulate on the floor;
- b. Failing to maintain the premises in a safe and reasonable condition;
- c. Permitting the substance to be on the floor for an unreasonable amount of time;
- d. Failing to warn customers, such as plaintiff, of the dangerous, negligent and/or defective condition;

- e. Failing to reasonably inspect the premises for dangerous, negligent and/or defective condition;
- f. Failing to keep walking ways clear of dangerous and/or defective conditions;
- g. Failing to have adequate policies and/or procedures to maintain the premise in a safe and reasonable condition;
- h. Failing to train or implement policies and/or procedures to ensure the premise is maintained in a safe and reasonable condition;

15. As a result of the Defendant's negligence, as is set forth hereinabove, the Plaintiff suffered personal injuries, including injuries to bilateral knees, legs, lower, middle and upper back, neck, and radicular pains to extremities.

16. As a result of the Defendant's negligence, as is set forth hereinabove, the Plaintiff has sustained and will continue to sustain pain, suffering, loss of life's pleasures, loss of earnings and earning capacity, and expenses for medication and treatments.

WHEREFORE, Plaintiff prays judgment against the Defendant in an amount in excess of \$50,000.00.

Respectfully submitted,

/s/ Shane Hickey

SHANE P. HICKEY
ATTORNEY FOR PLAINTIFF

VERIFICATION

I, SHANE HICKEY, ESQ. hereby verify and say that the statements made in the foregoing documents are true and correct to the best of my knowledge, information, and belief. This verification is made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Shane P. Hickey

SHANE P. HICKEY
ATTORNEY FOR PLAINTIFF